

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

In Re: Applications of)	MM Docket No. 93-156
)	
TRINITY CHRISTIAN CENTER OF SANTA)	File No. BRCT-911129KR
ANA, INC.. d/b/a TRINITY BROAD-)	
CASTING NETWORK)	
For Renewal of License of)	
Station WHSG(TV), Monroe, Georgia)	
)	
and)	
)	
GLENDAL E BROADCASTING COMPANY)	File No. BPCT-920228KE
For Construction Permit)	
Monroe, Georgia)	

TO: The Honorable Joseph Chachkin
Administrative Law Judge

**STIPULATED TESTIMONY ON THE DIVERSIFICATION
AND MEDIA INTERESTS OF THE OFFICERS AND
DIRECTORS OF TRINITY CHRISTIAN CENTER OF
SANTA ANA, INC., D/B/A TRINITY BROADCASTING NETWORK
(JOINT EXHIBIT 1)**

Submitted by:

Colby M. May, Esq.
Joseph E. Dunne III, Esq.
MAY & DUNNE, CHARTERED
Suite 520
1000 Thomas Jefferson Street, NW
Washington, D.C. 20007
(202) 298-6345

Attorneys for Trinity Christian Center
of Santa Ana, Inc., d/b/a Trinity
Broadcasting Network

April 26, 1994

BEFORE THE
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DIRECTORS OF TRINITY CHRISTIAN CENTER OF SANTA
ANA, INC., D/B/A TRINITY BROADCASTING NETWORK**

Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network ("Trinity") is a nonprofit/nonstock California corporation. Trinity was incorporated on August 2, 1973, and operates pursuant to its corporate bylaws (Tab B). Trinity was recognized as a tax-exempt public charity by the Internal Revenue Service on November 30, 1973. Its holdings are irrevocably dedicated for charitable use, not for the private gain of its officers and directors.

1. The officers and directors of Trinity are as follows:

<u>Name</u>	<u>Position</u>
Paul F. Crouch	President/Director
Janice W. Crouch	Vice President/Director
Norman G. Juggert	Secretary-Treasurer/Director
Terrence M. Hickey	Assistant Secretary

Matthew Crouch	Assistant Secretary
Allan Brown	Assistant Secretary
Jane Duff	Assistant Secretary

2. Its assets and holdings, include:

a. Full Power Television and Radio Stations:^{1/}

- (1) KTVB-TV, Santa Ana, California (license acquired August 2, 1974);
- (2) WDLI(TV), Canton, Ohio (license acquired April 16, 1986);
- (3) WHSG(TV), Monroe, Georgia (CP Acquired December 28, 1989); and,
- (4) KGHO(AM/FM), Hoquiam, Washington (License acquired March 29, 1989)

b. Television Translator Stations:^{2/}

- | | |
|-----------------|------------------------------------|
| (1) W41BN | Dothan, Alabama |
| (2) W64DJ | Scottsboro, Alabama |
| (3) W52BC | Selma, Alabama |
| (4) K20CZ (CP) | Bullhead City, Arizona |
| (5) K63DK | Globe, Arizona |
| (6) K38CX | Shonto/Tonalea, Arizona |
| (7) K42BS | Fayetteville, Arkansas |
| (8) K27DI | Fort Smith, Arkansas |
| (9) K43CJ | Mountain Home, Arkansas |
| (10) K57FD | Atwater, California |
| (11) K55CN | Bakersfield, California |
| (12) K42DT (CP) | Coalinga, California ^{3/} |
| (13) K60BB | Desert Hot Springs, California |
| (14) K47EH (CP) | Eureka, California ^{4/} |
| (15) K54DN | Lancaster, California |
| (16) K53DT | Monterey, California |
| (17) K66BM | Palm Springs, California |
| (18) K15CO | Porterville, California |
| (19) K65DJ | Redding, California |
| (20) K27EG | Ridgecrest, California |
| (21) K69FB | Sacramento, California |

^{1/} TBN is also the licensee of an international short wave radio station, KTVB, Salt Lake City, Utah.

^{2/} Authorizations which have not yet been constructed are denoted with a "CP."

^{3/} Formerly, K53AT, Buellton, California

^{4/} Formerly, K30CC, Alturas, California

(22) K15DB (CP) Santa Barbara, California
 (23) K43CA (CP) Twentynine Palms, California^{5/}
 (24) K33BT Victorville, California
 (25) K25DO Ventura, California
 (26) K33DN Denver, Colorado
 (27) K47AQ Denver, Colorado
 (28) K48CG Loveland, Colorado
 (29) W67BG Dover, Delaware
 (30) W60BK Dunedin, Florida
 (31) W67BY Fort Myers, Florida
 (32) W23AQ Lake City, Florida
 (33) W58BK (CP) Naples, Florida
 (34) W19AZ (CP) Okeechobee, Florida
 (35) W17BO Sebring, Florida
 (36) W68CF Tampa, Florida
 (37) W23AC Albany, Georgia
 (38) W65BI Augusta, Georgia
 (39) W33AL Brunswick, Georgia
 (40) W19BP (CP) Luella, Georgia
 (41) W55BM Marietta, Georgia
 (42) W67BJ Savannah, Georgia
 (43) W20BF (CP) Tifton, Georgia^{6/}
 (44) W66BW Valdosta, Georgia
 (45) W46BZ (CP) Waycross, Georgia
 (46) K47BE Boise, Idaho
 (47) K16CQ Twin Falls, Idaho
 (48) K15DG Pocatello, Idaho
 (49) W34AY Champaign, Illinois
 (50) W29BG Decatur, Illinois
 (51) W30AW (CP) Elgin, Illinois
 (52) W36A0 Palatine, Illinois
 (53) W22AJ Waukegan, Illinois
 (54) W38BK Evansville, Indiana
 (55) W36AR Lafayette, Indiana
 (56) W24AI (CP) Elkhart, Indiana^{7/}
 (57) W65BK Terre Haute, Indiana
 (58) W61FF Cedar Rapids, Iowa
 (59) K58BX Davenport, Iowa
 (60) K42AM Ottumwa, Iowa
 (61) K65BY Waterloo, Iowa
 (62) K25DS Junction City, Kansas
 (63) K31BW Manhattan, Kansas
 (64) K15CN Salina, Kansas
 (65) K21AP Topeka, Kansas
 (66) K59DA Wichita, Kansas

^{5/} Formerly, K43CA, Quartzite, Arizona

^{6/} Formerly W39BJ, Waycross, Georgia

^{7/} Formerly W24AI, Michigan City, Indiana

(67)	W41AZ	Corbin, Kentucky
(68)	W62BH	Hopkinsville, Kentucky
(69)	K56DR	Baton Rouge, Louisiana
(70)	K45DI	Mermentau, Louisiana
(71)	K49DE (CP)	New Iberia, Louisiana ^{8/}
(72)	K59DG	New Orleans, Louisiana
(73)	W65CE	Shreveport, Louisiana
(74)	W63BR (CP)	York Center, Maine
(75)	W51AG	Presque Isle, Maine
(76)	W16AE	Cresaptown, Maryland
(77)	W42AU (CP)	Pittsfield, Massachusetts
(78)	W66BV	Detroit, Michigan
(79)	W19BA	Grand Rapids, Michigan
(80)	W29BE	Muskegon, Michigan
(81)	K58CM	Duluth, Minnesota
(82)	K58BS	Minneapolis, Minnesota
(83)	K60DS	Rochester, Minnesota
(84)	K19BG	St. Cloud, Minnesota
(85)	W29BH	Biloxi, Mississippi
(86)	W31AG	Clarksdale, Mississippi
(87)	W25AD	Columbus, Mississippi
(88)	W25BA	Grenada, Mississippi
(89)	W09AU (CP)	Greenville, Mississippi ^{9/}
(90)	W36AC	McComb, Mississippi
(91)	W63BK (CP)	Meridian, Mississippi ^{10/}
(92)	W58BO	Natchez, Mississippi
(93)	W46AV	Pascagoula, Mississippi
(94)	K56AU	Columbia, Missouri
(95)	K39CP	Poplar Bluff, Missouri
(96)	K49DG (CP)	Springfield, Missouri
(97)	K52DH	Springfield, Missouri
(98)	K34BR	St. Charles, Missouri
(99)	K18BT	St. Louis, Missouri
(100)	K53DW	Great Falls, Montana
(101)	K41CX	Helena, Montana
(102)	K26DD	Kalispell, Montana
(103)	K39AJ	Malcolm, Nebraska
(104)	K26CV	Ogallala, Nebraska
(105)	K19CU	Carson City, Nevada
(106)	K57FA	Las Vegas, Nevada
(107)	K45AV	Reno, Nevada
(108)	W36BJ	Atlantic City, New Jersey
(109)	K18CT	Raton, New Mexico
(110)	W64BH	Albany, New York
(111)	W14AH	Binghamton, New York

^{8/} Formerly K49DE, Lafayette, Louisiana

^{9/} Formerly W09AU, Laurel, Mississippi

^{10/} Formerly W63BK, Pensacola, Florida

(112)	W14AZ	Glen Falls, New York
(113)	W44BG (CP)	Ithaca, New York
(114)	W10BH	Jamestown, New York
(115)	W22AZ	Olean, New York
(116)	W41AE	Utica, New York
(117)	W68BL	Charlotte, North Carolina
(118)	W53BE (CP)	Fayetteville, North Carolina
(119)	W59BA	Goldsboro, North Carolina
(120)	W54BR (CP)	Greenville, North Carolina
(121)	W21BL (CP)	Jacksonville, North Carolina ^{11/}
(122)	W52BM (CP)	Lumberton, North Carolina
(123)	W38BB	Raleigh, North Carolina
(124)	W66BT	Statesville, North Carolina
(125)	W20AL	Wilmington, North Carolina
(126)	K56ET (CP)	Fargo, North Dakota
(127)	K22DQ	Grand Forks, North Dakota
(128)	K40DE	Williston, North Dakota
(129)	W40AE	Chillicothe, Ohio
(130)	W68BP	Dayton, Ohio
(131)	W51BI (CP)	Kirtland, Ohio
(132)	W32AR	Lexington, Ohio
(133)	W21AI	Portsmouth, Ohio
(134)	W47BC	Springfield, Ohio
(135)	W39AI	Youngstown, Ohio
(136)	W36AY	Zanesville, Ohio
(137)	K44BQ	Ardmore, Oklahoma
(138)	K27AZ	Lawton, Oklahoma
(139)	K33AG	Bend, Oregon
(140)	K33AO	Coos Bay, Oregon
(141)	K59DU	Grants Pass, Oregon
(142)	K58BG	Klamath Falls, Oregon
(143)	K21BC	Lakeview, Oregon
(144)	K57EK	Medford, Oregon
(145)	K14HA	Roseburg, Oregon
(146)	W44AG	Erie, Pennsylvania
(147)	W52BO	Meadville, Pennsylvania
(148)	W65CG (CP)	Pittsburgh, Pennsylvania
(149)	W42BJ	State College, Pennsylvania
(150)	W11BC	Williamsport, Pennsylvania
(151)	W40AW (CP)	Beaufort, South Carolina
(152)	W44AX	Charleston, South Carolina
(153)	W66BJ	Myrtle Beach, South Carolina
(154)	K20DA	Aberdeen, South Dakota
(155)	K15CW	Brookings, South Dakota
(156)	K38CQ	Huron, South Dakota
(157)	K27DB	Madison, South Dakota
(158)	K63EE (CP)	Mitchell, South Dakota
(159)	K33CO	Rapid City, South Dakota
(160)	K51EE	Sioux Falls, South Dakota

^{11/} Formerly W54BI, Georgetown, South Carolina

(161)	K31DP	Yankton, South Dakota
(162)	W46AJ	Cookeville, Tennessee
(163)	W66AZ	Farragut, Tennessee
(164)	W35AH	Jackson, Tennessee
(165)	W31AS	Morristown, Tennessee
(166)	K51CK	Abilene, Texas
(167)	K63DR	Austin, Texas
(168)	K26AP	Brownwood, Texas
(169)	K47ED	College Station, Texas
(170)	K57FC (CP)	Corpus Christi, Texas
(171)	K46DL (CP)	Kingsville, Texas ^{12/}
(172)	K53EH (CP)	Lubbock, Texas
(173)	K17BP	Palestine, Texas
(174)	K42DA	Paris, Texas
(175)	K20BW	San Antonio, Texas
(176)	K33CK	San Antonio, Texas
(177)	K15BV	Uvalde, Texas
(178)	K43DV	Victoria, Texas
(179)	K64CJ	Ogden, Utah
(180)	K39AK	Vernal, Utah
(181)	W16AL (CP)	Burlington, Vermont
(182)	W32BA	Lynchburg, Virginia
(183)	W49AP	Roanoke, Virginia
(184)	W24OI (CP)	Virginia Beach, Virginia ^{13/}
(185)	K23AS	Aberdeen, Washington
(186)	K36DG	Longview, Washington
(187)	K55EB	Spokane, Washington
(188)	K57FJ (CP)	Spokane, Washington
(189)	W39AZ	Parkersburg, West Virginia
(190)	W68BS	Green Bay, Wisconsin
(191)	W19BH	Janesville, Wisconsin
(192)	W33AX	Madison, Wisconsin
(193)	W42AF	Ripon, Wisconsin
(194)	W20AG	Sheboygan, Wisconsin
(195)	W55BY (CP)	Waupaca, Wisconsin
(196)	K35CN	Green River, Wyoming

3. Trinity also operates a cable television program service which reaches nearly 25,000,000 homes throughout the country via Trinity's uplink satellite facilities.

4. Paul F. Crouch, who is president and a director of Trinity, is also the president and a director of the following

^{12/} Formerly K62DY, Port Lavaca, Texas

^{13/} Formerly, W24OI, Norfolk, Virginia

corporations, all of which are non-profit, non-stock corporations operating as tax-exempt public charities:

- a. Trinity Broadcasting of Arizona, Inc. ("TBA"), licensee of:
 - i. Full Power Television Station
KPAZ-TV, Phoenix, Arizona (license acquired July 21, 1977)
 - ii. Television Translator Stations:
 - (1) K58AV Cottonwood, Arizona
 - (2) K62BA Flagstaff, Arizona
 - (3) K56ED Tucson, Arizona
 - (4) K57BD Tucson, Arizona
- b. Trinity Broadcasting of Denver, Inc., licensee of low power television station K57BT, Denver, Colorado.
- c. Trinity Broadcasting of Florida, Inc., licensee of full power television station WHFT-TV, Miami, Florida (license acquired July 1980).
- d. Trinity Broadcasting of Washington, Inc., licensee of full power television station KTBW-TV, Tacoma, Washington (license acquired November 30, 1984).
- e. Trinity Broadcasting of Indiana, Inc., licensee of full power television stations:
 - i. WKOI(TV), Richmond, Indiana (CP acquired May 19, 1980); and,
 - ii. WCLJ(TV), Bloomington, Indiana (CP acquired August 12, 1986)
- f. Trinity Broadcasting of New York, Inc., licensee of full power television station WTBY-TV, Poughkeepsie, New York (license acquired July 13, 1982).
- g. Trinity Broadcasting of Texas, Inc., licensee of full power television station KDTX-TV, Dallas, Texas (license acquired July 2, 1986).
- h. Jacksonville Educators Broadcasting, Inc., licensee of:

- i. Full Power Noncommercial Television Stations:
 - (1) WTCE(TV) Fort Pierce, Florida
 - (2) WJEB(TV) Jacksonville, Florida
- ii. Television Translator Stations:
 - (1) W66CC Melbourne/Fellsmere, Florida
 - (2) W47BG (CP) West Palm Beach, Florida
- i. Community Educational Television, Inc., licensee of full power noncommercial television stations:
 - (1) KETH(TV) Houston, Texas
 - (2) KITU(TV) Beaumont, Texas
 - (3) KLUJ(TV) Harlingen, Texas
- j. National Minority TV, Inc. ("NMTV"), licensee of:
 - i. Full Power Television Station
KNMT(TV), Portland, Oregon (CP
acquired December 19, 1988)
 - ii. Television Translator Stations:
 - (1) K33DE Little Rock, Arkansas
 - (2) K56DZ Fresno, California
 - (3) K21DP (CP) Sacramento, California
 - (4) W40AZ Wilmington, Delaware
 - (5) W22BP (CP) Thomasville, Georgia¹⁴/
 - (6) K51EC Lake Charles, Louisiana
 - (7) W18AY Portland, Maine
 - (8) W20BA Massena, New York
 - (9) W59CH (CP) Syracuse, New York
 - (10) W24BK Columbus, Ohio
 - (11) W46BX Toledo, Ohio
 - (12) W68CD Toledo, Ohio
 - (13) W62BV Charlotte, North Carolina
 - (14) W51BR (CP) Columbia, South Carolina
 - (15) W66CA (CP) Spartanburg, South Carolina
 - (16) K20DM (CP) Amarillo, Texas
 - (17) K53EN (CP) Temple, Texas
 - (18) K26DL Wichita Falls, Texas
 - (19) K36CJ Salt Lake City, Utah
 - (20) W45AZ (CP) Charleston, West Virginia
 - (21) W19BK Huntington, West Virginia

¹⁴/ Formerly W38BP, Panama City, Florida.

- (22) W26BG (CP) Geneva, New York
- (23) W67DA (CP) Richmond, Virginia

iii. Applicant for:

- (1) Channel 26 Scranton, Pennsylvania
- (2) Channel 58 Charlottesville, Virginia
- (3) Channel 32 Knoxville, Tennessee
- (4) Channel 52 Oswego, New York
- (5) Channel 69 Asheville, North Carolina
- (6) Channel 66 Opelousas, Louisiana
- (7) Channel 18 Hampton, Virginia

5. Jane Duff, an officer of Trinity, is also an officer and a director of National Minority TV, Inc.; Community Educational Television, Inc.; and, Jacksonville Educators Broadcasting, Inc. Mrs. Duff is also an officer (assistant secretary) of: Trinity Broadcasting of Florida, Inc.; Trinity Broadcasting of Oklahoma City, Inc.; Trinity Broadcasting of Denver, Inc.; Trinity Broadcasting of Washington; Trinity Broadcasting of Indiana, Inc.; Trinity Broadcasting of New York, Inc.; Trinity Broadcasting of Arizona, Inc.; and, Trinity Broadcasting of Texas, Inc.

6. Janice W. Crouch, a director and vice president of Trinity, is also an officer and director of: Trinity Broadcasting of Florida, Inc.; Community Educational Television, Inc.; Jacksonville Educators Broadcasting, Inc.; Trinity Broadcasting of Arizona, Inc.; Trinity Broadcasting of Denver, Inc.; Trinity Broadcasting of Indiana, Inc.; Trinity Broadcasting of New York, Inc.; Trinity Broadcasting of Oklahoma City, Inc.; Trinity Broadcasting of Texas, Inc.; and, Trinity Broadcasting of Washington.

7. Norman G. Juggert, a secretary-treasurer and director of Trinity, is also an officer and director of: Trinity Broadcasting of Florida, Inc.; Trinity Broadcasting of Arizona, Inc.; Trinity Broadcasting of Denver, Inc.; Trinity Broadcasting of Indiana, Inc.; Trinity Broadcasting of New York, Inc.; Trinity Broadcasting of Oklahoma City, Inc.; Trinity Broadcasting of Texas, Inc.; Trinity Broadcasting of Washington; Jacksonville Educators Broadcasting, Inc.; and, Community Educational Television, Inc.

8. Messrs. Matthew Crouch, Terrence M. Hickey and Allan Brown are officers (assistant secretaries) but not directors of the same corporations as Dr. Paul Crouch, except Matthew Crouch is not an officer of National Minority TV, Inc..

SUPPORTING DECLARATION

I, Terrence M. Hickey, hereby swear under penalty of perjury of the laws of the United States and the State of California, that the foregoing "STIPULATED TESTIMONY ON THE DIVERSIFICATION AND MEDIA INTERESTS OF THE OFFICERS AND DIRECTORS OF TRINITY CHRISTIAN CENTER OF SANTA ANA, INC., D/B/A TRINITY BROADCASTING NETWORK," consisting of 10 pages, was prepared under my direction for submission to the Federal Communications Commission in connection with MM Docket No. 93-156, *Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network, et al.*, and that this material is true and accurate to the best of my knowledge and belief.

EXECUTED this 19 day of April 1994.

By:


Terrence M. Hickey

STIPULATED TESTIMONY OF JOHN P. ALLEN

John P. Allen, under penalty of perjury, declares that the following is true and correct to the best of his knowledge:

1. I am a professional aeronautical consultant. My qualifications are a matter of record in the FCC's files.

2. In February 1992 I was retained by Glendale Broadcasting Company ("Glendale") to perform an aeronautical study on its proposed 1,124 foot tower located at coordinates 33° 46' 17" NL, 84° 00' 25" WL. On February 19, 1992 I filed a Notice of Proposed Construction or Alteration for Glendale's proposed tower with the Federal Aviation Administration ("FAA"). Because Glendale's proposed tower was over 500 feet high above ground, at that time I requested that an aeronautical study be conducted.

3. In mid-September 1992 I received a call from Robert Shipp of the FAA, who informed me that the comments received as part of the aeronautical study involving Glendale's proposed construction had alleged the existence of a Visual Flight Rules ("VFR") route near the proposed tower. A VFR route is a route used by pilots who are navigating by visual landmarks. There was no way for me to determine the existence of that VFR route when I filed the Notice of Proposed Construction or Alteration with the FAA in February 1992. Because there is no map or other documents which show the location of VFR routes, I asked the FAA to perform a radar study to determine whether the alleged VFR route actually existed. The FAA performed such a study, which concluded that the VFR route did exist.

Federal Communications Commission

Docket No. 73-156 Exhibit No. IF-2

Presented by Glendora

Disposition	Identified	<u>5.17.94</u>
	Received	<u>5.17.94</u>
	Rejected	<u> </u>

Reporter AW

Date 5.17.94

4. In subsequent discussions with Mr. Shipp of the FAA, I attempted to persuade him that the FAA should approve the proposed tower because it would have no greater effect on the VFR route than the existing 1,149 foot tower which was used by Trinity Broadcasting Network ("Trinity"). The FAA rejected that argument because it was concerned about the existence of a "goal post" where planes using the VFR route would have to fly in-between the Trinity tower and Glendale's proposed tower. Mr. Shipp told me the FAA would issue a determination of hazard to air navigation unless Glendale moved its tower to a new location aligned so that the two towers would form a line parallel to the VFR route on a northwest or southeast direction. At no time, however, was any consideration given to the FCC's requirements regarding channel spacing.

5. If Glendale had attempted to propose a new tower site more than one mile from its original site or the Trinity tower, the FAA would have required Glendale to submit a new Notice of Proposed Construction or Alteration and would have conducted a new aeronautical study, including the solicitation and review of new comments from the aeronautical community. Such a study would have taken several months to complete, and there would always be a possibility that the FAA would reject the new tower construction proposal because of another VFR route or adverse comments from the aeronautical community. The only circumstances where no FAA notice or approval are required are: (1) when construction is done on an existing tower and there is no increase in the overall height of

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900 P04 MAY 16 '94 11:50

the tower (such as a side-mounting of a new antenna); and (2) when the proposed tower is less than 200' above ground level.

6. On November 22, 1992, I notified the FAA that Glendale proposed an alternate tower site at coordinates 33° 44' 38" NL, 84° 00' 39" WL with a tower 1,089 feet above ground. This site is approximately one-half mile northwest of Trinity's existing tower. On December 16, 1992, the FAA issued a Determination of No Hazard to Air Navigation for that proposed tower. The FAA's determination became final on January 25, 1993.

7. At no time during my engagement by Glendale was I ever directed to locate an antenna site or tower where Glendale might construct its proposed facility for channel 63, Monroe, Georgia. I have no knowledge of the criteria used by the FCC in evaluating applications submitted to it, nor do I have any knowledge of its channel spacing requirements, and at no time did I render any advice to Glendale on whether its proposal complied with the FCC's requirements.

Dated: May 16, 1994


John P. Allen

STIPULATED TESTIMONY OF GREGORY B. DALY

Gregory B. Daly, under penalty of perjury, declares that the following is true and correct to the best of my knowledge:

1. I am owner of Telecommunications Site Acquisition, Inc. ("TelSA"). TelSA is a company that assists clients in site related tasks, including the location of antenna sites for applicants before the Federal Communications Commission ("Commission"). I have been involved in locating sites for applicants before the Commission since 1983, and I have located over 5,000 such sites.

2. In January 1992 Mr. Lewis Cohen, on behalf of Glendale Broadcasting Company ("Glendale"), retained my services to locate a transmitter site for an application Glendale wanted to file for a television station, channel 63, at Monroe, Georgia. I was informed that Glendale's application would be mutually exclusive with the application for Trinity Broadcasting Network ("Trinity"), licensee of WHSG(TV), Monroe, Georgia.

3. John J. Mullaney of Mullaney Engineering, Inc., Glendale's consulting engineer, gave me instructions for locating a site for this facility. Mr. Mullaney provided me with a map of the area showing the location of the tower site owned and used by Trinity. Mr. Mullaney also identified on that map the area where an antenna tower site for channel 63, Monroe, could be located in order to be fully separated under the rules of the FCC from an educational channel 63 allocation in Montgomery, Alabama. My instructions from Mr. Mullaney, however, were to find a piece of property approximately 16 to 31 acres in size as close as possible

Federal Communications Commission

Docket No. 93-156 Exhibit No. Jt. 3

Presented by Glendale

Disposition { Identified 5-17-94
Received 5-17-94
Rejected _____

Reporter AW

Date 5-17-94

to Trinity's existing tower, not in the area identified where a fully spaced site could be located.

4. Mr. Mullaney also instructed me that the site should not be southwest of Trinity's existing tower because he did not want to increase the short-spacing that already existed between Trinity's station and the vacant allotment for channel 63, Montgomery, Alabama. Mr. Mullaney never told me to look for a site that was fully spaced to the Montgomery allocation, and I never did.

5. In late January and early February 1992, I travelled to Georgia to locate a site for Glendale. I searched in the area that Mr. Mullaney instructed me to search in. I reviewed land records in three different counties. I spent five days searching for an available and suitable site. I attempted to contact most or all of the land owners whose parcels were large enough to accommodate Glendale's acreage requirements.

6. I found three land owners with parcels of land large enough to accommodate Glendale's proposed tower who were willing to provide reasonable assurance of site availability. I rejected one of the three sites as unsuitable because it was too close to an airport. The second site was rejected because the land owner wanted \$800,000, or two to three times the market value of the property, for his land. I selected the third site, which was owned by Martha Day Bryant, which was suitable. Glendale's original application specified the Bryant property as its transmitter site.

7. In the fall of 1992, Mr. Mullaney informed me that the Federal Aviation Administration ("FAA") had rejected the Bryant

site. As a result, I was again retained by Glendale to locate another transmitter site. Mr. Mullaney instructed me that to obtain FAA approval, the site was to be located as close as possible to Trinity's tower (preferably no more than 2,000 feet from Trinity's tower) and either northwest or southeast of that tower. I was not instructed to search for a fully spaced site, and I made no investigation for a site that was fully spaced to the Montgomery, channel 63 allocation.

8. The only available site I could locate which met the search parameters given by Mr. Mullaney was a property owned by Clarence Hall. The Hall property was approximately one-half mile northwest of Trinity's tower. It is my understanding that the FAA approved Glendale's tower at the Hall site.

9. At no time did I ever advise Glendale, or any of its agents or representatives, on compliance matters involving the rules and regulations of the FAA or the FCC.

Date: May 16, 1994

Gregory B. Daly
Gregory B. Daly

STIPULATION RE
PUBLIC SERVICE ANNOUNCEMENTS

Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network (Trinity) and Glendale Broadcasting Company (Glendale) now stipulate as follows:

The program logs for WHSG(TV) indicate that the number of public service announcements (PSAs) listed below aired on WHSG(TV) during the renewal period. The chart lists the number of PSAs that ran during each week of the renewal period in the following lengths: 10 seconds, 15 seconds, 20 seconds, 30 seconds, one minute, and longer than 1 minute. For instance, the number 4 under the :30 column for the week 3/15/92 - 3/21/92 means that the four thirty second PSAs were aired during that week.

<u>Week</u>	<u>:10</u>	<u>:15</u>	<u>:20</u>	<u>:30</u>	<u>1:00</u>	<u>Longer than one minute</u>
3/29/92 - 3/31/92	0	0	0	0	1	0
3/22/92 - 3/28/92	0	0	2	0	1	0
3/15/92 - 3/21/92	0	0	0	4	0	0
3/8/92 - 3/14/92	0	1	2	4	2	0
3/1/92 - 3/7/92	0	1	2	5	2	0
2/23/92 - 2/29/92	0	1	1	5	4	0
2/16/92 - 2/22/92	0	1	0	6	2	0
2/9/92 - 2/15/92	0	1	3	7	1	0
2/2/92 - 2/8/92	0	1	2	5	1	0
1/26/92 - 2/1/92	0	0	0	6	1	1 3:10
1/19/92 - 1/25/92	0	1	2	7	5	1 3:00
1/12/92 - 1/18/92	0	1	4	10	6	0

Good Community Service

Case No. 93-156 JT, 4

Reported by Atencio

Disposition 5-17-93
5-12-93

Reporter Av

Date 5-12-93

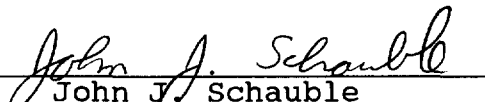
1/5/92 - 1/11/92	0	0	0	2	2	1 3:00
12/29/91 - 1/4/92	0	1	2	7	4	0
12/22/91 - 12/28/91	0	0	1	1	1	1 3:00
12/15/91 - 12/21/91	0	0	0	2	3	0
12/8/91 - 12/14/91	0	1	2	7	6	0
12/1/91 - 12/7/91	0	0	1	4	4	0
11/24/91 - 11/30/91	1	1	2	9	1	1 3:00
11/17/91 - 11/23/91	0	0	2	3	3	0
11/10/91 - 11/16/91	0	0	1	2	3	0
11/3/91 - 11/9/91	0	0	0	0	0	0
10/27/91 - 11/2/91	0	1	1	4	7	0
10/20/91 - 10/26/91	0	0	1	7	2	1 1:30
10/13/91 - 10/19/91	0	0	0	10	1	0
10/6/91 - 10/12/91	0	0	1	13	4	0
9/29/91 - 10/5/91	0	1	1	10	7	0
9/22/91 - 9/28/91	0	0	3	13	6	1 1:30
9/15/91 - 9/21/91	0	1	2	14	5	0
9/8/91 - 9/14/91	0	0	3	6	5	0
9/1/91 - 9/7/91	1	0	2	12	9	0
8/25/91 - 8/31/91	1	1	3	21	10	0
8/18/91 - 8/24/91	2	0	1	22	4	0
8/11/91 - 8/17/91	2	1	1	15	8	2 1:30
8/4/91 - 8/10/91	0	1	2	13	8	1 1:30
7/28/91 - 8/3/91	0	0	0	7	10	0
7/21/91 - 7/27/91	0	0	1	2	0	0
7/14/91 - 7/20/91	1	0	2	15	5	1 1:30
7/7/91 - 7/13/91	0	0	4	9	8	0
6/30/91 - 7/6/91	0	0	3	13	11	1 3:00
6/23/91 - 6/29/91	0	0	2	11	9	1 1:30
						1 3:00
6/16/91 - 6/22/91	0	0	4	8	9	1 1:30
6/9/91 - 6/15/91	0	1	2	18	6	1 3:00
6/2/91 - 6/8/91	0	1	2	14	8	1 1:30
5/26/91 - 6/1/91	0	0	1	20	14	0
5/19/91 - 5/25/91	0	0	4	8	9	0
5/12/91 - 5/18/91	0	0	4	11	5	0
5/5/91 - 5/11/91	1	1	3	16	10	1 1:30
4/28/91 - 5/4/91	0	0	5	12	9	0
4/21/91 - 4/27/91	0	0	2	7	7	0
4/14/91 - 4/20/91	1	0	2	10	4	0
4/7/91 - 4/13/91	1	1	0	7	5	1 1:30
3/31/91 - 4/6/91	0	0	0	0	0	0
3/24/91 - 3/30/91	0	0	0	5	3	0
3/17/91 - 3/23/91	0	1	1	6	8	1 1:30
3/10/91 - 3/16/91	0	1	1	10	4	0
3/3/91 - 3/9/91	1	0	1	8	6	0
2/26/91 - 3/2/91	1	0	2	14	10	0

**TRINITY CHRISTIAN CENTER OF SANTA ANA,
INC. d/b/a TRINITY BROADCASTING NETWORK**

By 
Joseph E. Dunne, III

May & Dunne, Chartered
1000 Thomas Jefferson Street, N.W.,
Suite 520
Washington, D.C. 20007
(202) 298-6345

GLENDAL E BROADCASTING COMPANY

By 
John J. Schauble

Cohen & Berfield, P.C.
1129 20th Street, N.W., Suite 507
Washington, D.C. 20036
(202) 466-8565